

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
Individual and Representative  
Plaintiffs,  
v.  
META PLATFORMS, INC., a Delaware  
corporation,  
Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE FOR  
THIRD-PARTY SEALING OF SUMMARY  
JUDGMENT BRIEFS**

Pursuant to Civ. L.R. 6-2 and 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz, Lysa Terkeurst and Christopher Farnsworth (“Plaintiffs”); and Defendant Meta Platforms, Inc. (“Meta”) (collectively, the “Parties”), by and through their respective counsel, stipulate to the following:

1. On March 12, 2025, the Court entered an order directing the parties to refile each summary judgment brief and any motions to seal excerpts of the brief within 5 days of the initial filing deadline. Dkt. 477. That order also set an April 25, 2025 deadline for publicly refiling summary judgment exhibits and motions to seal summary judgment exhibits (i.e., the Friday before the summary judgment hearing). *Id.*

1       2. On April 7, 2025, Plaintiffs filed a combined summary judgment opposition and reply brief.  
 2              Dkt. 517. Plaintiffs' brief references information over which two third parties<sup>1</sup> have asserted  
 3              confidentiality. Those passages are located at:  
 4                  • Page 28, footnote 15;  
 5                  • Page 30, lines 9-10; and  
 6                  • Page 30, footnote 17.

7       3. Plaintiffs also filed three exhibits originally produced by these third parties, and over which  
 8              the third parties have asserted confidentiality:  
 9                  • Plaintiffs' Exhibit 134;  
 10                 • Plaintiffs' Exhibit 135; and  
 11                 • Plaintiffs' Exhibit 139.

12      4. Plaintiffs are coordinating with the third parties regarding the sealing declaration process  
 13              for these materials, as outlined in Civ. L-R 79-5(f). Those discussions are ongoing,  
 14              continuing into this week.

15      5. To afford sufficient time for the third parties to prepare their sealing declarations, and to  
 16              reduce the burden on third parties that would result from filing two separate sealing  
 17              declarations for Plaintiffs' brief and Plaintiffs' exhibits, the parties stipulate as follows:

18              NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through  
 19              Plaintiffs and Meta, as represented by their undersigned counsel and subject to the approval of the  
 20              Court, that the third parties shall be afforded until April 25, 2025 to file a declaration in support of  
 21              sealing the implicated passages of Plaintiffs' April 7 brief alongside their declaration in support of  
 22              sealing the summary judgment exhibits. The implicated passages of Plaintiffs' April 7 brief have  
 23              been refiled in redacted form pending submission of the third-party sealing declarations.

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 28       <sup>1</sup> Plaintiffs do not reference the third parties by name due to confidentiality considerations and the  
             Court's prior sealing guidance. See Dkt. 498.

1 Dated: April 14, 2025

2 By /s/ Matthew Brigham

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24 Respectfully Submitted,

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*Counsel for Individual and Representative Plaintiffs and the Proposed Class*

## **PROPOSED ORDER**

Pursuant to the stipulation of the Parties, IT IS SO ORDERED.

DATED:

HON. VINCE CHHABRIA  
United States District Judge

## **ECF ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Meta concurs in the filing of this document.

/s/ Jay Schuffenhauer